

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY
TECHNOLOGIES INC.,

Plaintiff,

v.

LENOVO GROUP LIMITED,

Defendant.

Case No. 2:23-cv-00449-JRG

JURY TRIAL DEMANDED

**PROPOSED PROTECTIVE ORDER GOVERNING PRODUCTION OF DOCUMENTS
AND INFORMATION BY NON-PARTY TEXAS INSTRUMENTS INC.**

WHEREAS, prior to the disclosure in this matter of its confidential information, non-party Texas Instruments Incorporated (“TI”) seeks protections in addition to those set forth in the Protective Order previously stipulated to by the Parties and entered by the Court. [Dkt. No. 32 (the “Protective Order”)]

THEREFORE, it is hereby stipulated among the Parties and ORDERED pursuant to Fed. R. Civ. P. 26(c) that:

A. Scope

1. This Supplemental Protective Order sets forth additional restrictions governing the disclosure of Protected Material that constitutes or includes confidential or proprietary information or trade secrets of TI (“TI Protected Material”).

2. Except as supplemented or amended herein, the provisions of the Protective Order will apply to TI Protected Material. In the event of a conflict between the Protective Order and this Supplemental Protective Order, the terms of this Supplemental Protective Order will govern.

3. Except as expressly stated otherwise, all terms used in this Supplemental Protective Order have the same meaning as used in the Protective Order.

B. Modifications to the Protective Order

4. Amend the final sentence in paragraph 1(a) as follows:

For the avoidance of doubt, the producing Party may designate as source code make files, link files, algorithms, pseudocode, and other human-readable files used in the generation, building or compiling of software or firmware; RTL, VHDL, Verilog, netlists, design databases, schematics, layout files, mask files, and other human-readable or machine-readable files used in the design, generation, building, synthesis, layout, or manufacture of integrated circuits; and electronic or hard copy prints or excerpts of any of these files.

5. With regard to Paragraph 11 of the Protective Order, the patent prosecution bar applies with respect to receipt of TI's Protected Material.

SO ORDERED this ____ day of _____, 20__.

[Judge]

Exhibit A

**CERTIFICATION OF OUTSIDE CONSULTANT
REGARDING PROTECTIVE ORDER**

I, _____, state:

1. I have read the Supplemental Protective Order for TI Protected Material and understand and will abide by its terms.

I state under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on _____, 20_____.

Signature